

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(NORTHERN DIVISION)

STEVEN J. SHAPIRO,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. MJG-02-3931
)	
RAY T. BERRY and)	
BEHAVIORAL HEALTH CARE)	
MANAGEMENT SYSTEMS, INC.,)	
)	
Defendants.)	

PLAINTIFF'S PRELIMINARY EXPERT WITNESS DESIGNATION

Plaintiff Steven J. Shapiro, by and through his undersigned counsel and pursuant to Fed. R. Civ. P. 26(a)(2), Local Rule 104, and the Scheduling Order entered on January 21, 2003, hereby designates the expert witnesses whom Mr. Shapiro reserves the right to call at trial. This list is exclusive of witnesses to be offered for rebuttal and/or impeachment purposes. This designation is necessarily incomplete at this stage, as discovery is ongoing and information required for any opinions to be finalized has not been provided to Mr. Shapiro. In particular, defendants have yet to respond to discovery that was propounded to them. Mr. Shapiro therefore reserves the right to supplement this designation with additional expert witnesses and other information.

1. Herman P. Miller, Ph.D., 105 Bluff Terrace, Silver Spring, Maryland 20902, (301) 593-1148. Dr. Miller is an economist and economic consultant who is expected to testify as an expert witness on damages issues in this case. More specifically, Dr. Miller may be asked to testify as to the amount of profit to which Mr. Shapiro is

entitled to recover from the defendants, as well as the value of Mr. Shapiro's contribution to the business formed by the parties.

At this preliminary stage of the case, Dr. Miller has not reached a final opinion on these matters as he does not have information that includes matters requested from the defendants in discovery. Dr. Miller's opinions will be based upon his expertise and training in the field of economics and his review of information exchanged in discovery in this case.

Respectfully submitted,

JACKSON & CAMPBELL, P.C.

/s/ Vernon W. Johnson, III

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CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of March, 2003 I caused a copy of the foregoing Plaintiff's Preliminary Expert Witness Designation to be served, by fax and by first class mail, postage prepaid, upon the following:

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